

# **FTC MOTION FOR TEMPORARY RESTRAINING ORDER**

## **EXHIBIT 10**

**Declaration of FTC Paralegal Celia Garrett**

**DECLARATION OF CELIA GARRETT**

**PURSUANT TO 28 U.S.C. § 1746**

I, Celia Garrett, hereby state that I have personal knowledge of the facts set forth below. If called as a witness, I could and would testify competently as follows:

1. I am a citizen of the United States and am over the age of 18 years. My formal education includes a Bachelor of Arts in Public Policy from Duke University.

2. I am an Honors Paralegal at the Federal Trade Commission (“FTC”) and have been employed as such since September 30, 2019. My business address is 600 Pennsylvania Avenue NW, Washington, DC 20580.

3. As an Honors Paralegal, my job functions include providing litigation and investigation support to Bureau of Consumer Protection attorneys and other staff involved in the litigation of FTC cases. In the normal course of assisting with investigations, I regularly use Internet search engines to find websites, videos, and other relevant information, and software to preserve copies of this information.

4. In the course of my duties, I was assigned to work on the FTC’s investigation of several entities and individuals selling credit repair and related services through a multi-level marketing structure, including: Financial Education Services (“FES”), United Credit Education Services (“UCES”), and Youth Financial Literacy Foundation (“YFLF”). I have assisted the FTC attorneys with this investigation by, among other things, searching for videos related to these entities on YouTube and preserving them.

5. In March 2021, I preserved one video posted to FES’s YouTube channel. As part of this assignment, I remotely used the computers in the FTC’s Internet Lab to visit the FES YouTube channel. Using the Mozilla Firefox web browser, I viewed and navigated through each of the videos posted to the FES YouTube channel. I identified one video and downloaded the video using “RealDownloader,” which is a Firefox browser extension that allows users to download videos posted online. This video has the file name “FES Complete Compensation Plan - Financial Education Services 2018.mp4.” I

downloaded the video directly from the FES YouTube channel in an mp4 format that is readily viewable offline. I then transferred the video file via secure file transfer to the FTC's network. I then saved the video file on the FTC's secured network, in a folder with limited access. I provided access to other members of the case team, including Elena Hoffman.

6. In March 2021, I also preserved videos related to FES marketing and the FES compensation plan on various other YouTube channels. In March 2021 and May 2021, I remotely used the computers in the FTC's Internet Lab to visit YouTube. I searched for FES videos using various search terms. Using the Mozilla Firefox web browser, I viewed and navigated through several videos that appeared in the YouTube search results. I identified several videos that were recently posted and went into detail about the company, and downloaded these videos using RealDownloader. I downloaded the videos directly from YouTube in an mp4 format that is readily viewable offline. For each video that I downloaded, I also used the Firefox web browser to capture a screenshot. I then transferred the video files and screenshot images via secure file transfer to the FTC's network. I then saved the video files on the FTC's secured network, in a folder with limited access. I converted the screenshots into PDF files and saved the files in the same folder on the FTC's secured network. I provided access to other members of the case team, including Elena Hoffman.

7. The video files I downloaded from YouTube in March 2021 are labeled:

- a. "Financial Education Services Detailed Corporate Overview.mp4;"
- b. "FES 2017 Overview and Compensation,mp4;"
- c. "FES Compensation plan,mp4;"
- d. "FES Services and Compensation Plan.mp4;" and
- e. "How I Increased My credit 186 Points and Got Paid!! Secrets Revealed – FES Compensation.mp4."

8. In May 2021, I navigated to YouTube.com and accessed several of the YouTube videos I had previously downloaded in March. For several videos that I had previously downloaded, I used the Firefox web browser to capture a screenshot. I then transferred the screenshot images via secure file

transfer to the FTC's network and converted the screenshot images into PDF files. I then saved the files on the FTC's secured network, in a folder with limited access. I provided access to other members of the case team, including Elena Hoffman. The screenshots I captured from YouTube in May 2021 that correspond to some of the videos listed in paragraph 7 are labeled:

- a. "Financial Education Services Detailed Corporate Overview.pdf;"
  - b. "FES 2017 Overview and Compensation.pdf;"
  - c. "FES Services and Compensation Plan.pdf;" and
  - d. "How I Increased My credit 186 Points and Got Paid!! Secrets Revealed – FES Compensation.pdf."
9. The video files I downloaded from YouTube in May 2021 are labeled:
- a. "A full overview of the UCES Services and FES Business Opportunity.mp4;"
  - b. "AWESOME AGENT Testimonials.mp4;"
  - c. "BLUEPRINT TO 6-Figure income with SRVP Alfred Nickson.mp4;"
  - d. "FES Business Overview.mp4;"
  - e. "Financial Education Services Overview Simplified.mp4;"
  - f. "Financial Education Services Overview With Bruce Rochester.mp4;"
  - g. "How to acquire 13 clients in a week.mp4;"
  - h. "Make Money From Home And Make Money Working With Financial Education Services UCES Protection Plan.mp4;" and
  - i. "Negocio Modelo De Casa FES UCES Protection Plan Presentacion Corta.mp4."

10. The screenshots I captured from YouTube in May 2021 that correspond to the videos listed in paragraph 9 are labeled:

- a. "A full overview of the UCES Services and FES Business Opportunity.pdf;"
- b. "AWESOME AGENT Testimonials.pdf;"
- c. "BLUEPRINT TO 6-Figure income with SRVP Alfred Nickson.pdf;"
- d. "FES Business Overview.pdf;"

- e. "Financial Education Services Overview Simplified.pdf;"
- f. "Financial Education Services Overview With Bruce Rochester.pdf;"
- g. "How to acquire 13 clients in a week.pdf;"
- h. "Make Money From Home And Make Money Working With Financial Education Services UCES Protection Plan.pdf;" and
- i. "Negocio Modelo De Casa FES UCES Protection Plan Presentacion Corta.pdf."

11. In May 2021, I preserved several videos posted to a YouTube channel belonging to "Jerry Thompson." I remotely used the computers in the FTC's Internet Lab to visit the FES YouTube channel. Using the Mozilla Firefox web browser, I viewed and navigated through the videos posted to Thompson's YouTube channel. I identified several videos related to FES and downloaded the videos using RealDownloader. I downloaded the videos directly from Jerry Thompson's YouTube channel in an mp4 format that is readily viewable offline. For each video that I downloaded, I also used the Firefox web browser to capture a screenshot. I then transferred the video files and screenshot images via secure file transfer to the FTC's network. I then saved the video files on the FTC's secured network, in a folder with limited access. I converted the screenshots into PDF files and saved the files in the same folder on the FTC's secured network. I provided access to other members of the case team, including Elena Hoffman.

12. The video files I downloaded from Jerry Thompson's YouTube channel in May 2021 are labeled:

- a. "5 reasons why you will make money with rNetwork.mp4;"
- b. "A home based business that even an 85 year old can do.mp4;"
- c. "Build wealth easy steps 1, 2, 3.mp4;"
- d. "How to not fail in network marketing.mp4;" and
- e. "Why people fail in network marketing.mp4."

13. The screenshots I captured from Jerry Thompson's YouTube channel in May 2021 that correspond to the videos listed in paragraph 12 are labeled:

- a. "5 reasons why you will make money with rNetwork.pdf;"

- b. "A home based business that even an 85 year old can do.pdf;"
- c. "Build wealth easy steps 1, 2, 3.pdf;"
- d. "How to not fail in network marketing.pdf;" and
- e. "Why people fail in network marketing.pdf."

I state under penalty of perjury, that the foregoing is true and correct.

Executed on June 10, 2021, in Rye, NY.

CELIA  
GARRETT

Digitally signed by CELIA  
GARRETT  
Date: 2021.06.10 11:09:58  
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Celia Garrett